

Mr. Ricky Smith
AM General Corporation
13200 McKinley Highway
Mishawaka, Indiana 46545

Re: 141-15726
First Minor Permit Modification to
Part 70 No.: T 141-6023-00031

Dear Mr. Smith:

AM General Corporation was issued a Part 70 permit on February 25, 1999 for a military and commercial HUMMER production plant. A letter requesting changes to this permit was received on June 13, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document. (changes are **bolded** and deletions are ~~struck-through~~ for emphasis).

Request: IDEM has informed AM General that the deadline for testing will expire at the end of August 2002. The source requests that the testing requirements in Condition D.5.14(e) be moved back since the maximum production will not be achieved until the late September 2002. IDEM has told AM General that it must test during August and then test again when it reaches full capacity at a cost in excess of \$60,000 for each test.

Reply: This request was referred to Compliance Data Section (CDS), and allowed the test to be deferred to September 30, 2002. Condition D.5.14(e) will be modified as follows:

D.5.14(e) The compliance tests required in (a), (b) and (c) of this condition shall be made ~~within 60 days after achieving maximum production rate, but no longer than 180 after initial start-up.~~ **by September 30, 2002 at maximum production capacity or its capacity at the time of testing. Another test shall be performed if the initial test was conducted at less than 95% capacity, and be made sixty (60) days after achieving maximum production.**

Upon further review OAQ has made the following changes to Condition D.5.21(a), because the real intention of this condition is for the source to maintain a minimum operating temperature determined by a performance test to maintain the required destruction efficiency. Until a performance test is performed a minimum operating temperature of 1350°F should be maintain.

Compliance Monitoring Requirements

D.5.21 Operating Parameters

- (a) The Regenerative Thermal Oxidizer shall maintain a minimum operating temperature **determined by a performance test to maintain** at least 95% destruction efficiency, that is necessary to achieve compliance with condition D.5.5(c) and D.5.7. **Until a performance test is performed the combustion chamber shall maintain a minimum operating temperature of 1350 °F.** ~~or a minimum operating temperature determined in the most recent stack tests to maintain at least 95% destruction efficiency, that is necessary to achieve compliance with condition D.5.5(c) and D.5.7:~~ The operating

temperature of the exhaust of the RTO shall be continuously recorded whenever it is operating.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - St. Joseph County
U.S. EPA, Region V
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY and ST. JOSEPH LOCAL AGENCY

**AM General Corporation
13200 McKinley Highway
Mishawaka, Indiana 46545**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T141-6023-00031	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: February 25, 1999
1 st Administrative Amendment No.: 141-12041, issued on April 20, 2000 2 nd Administrative Amendment No.: 141-12212, issued on August 22, 2000 3 rd Administrative Amendment No.: 141-12413, issued on August 4, 2000 4 th Administrative amendment No.: 141-14597, issued on July 31, 2001 First Reopening No.: 141-13466, issued on November 1, 2001 First Significant Permit Modification No.: 141-15219, issued on May 8, 2002	
1 st Minor Permit Modification No.: 141-15726	Pages Affected: 35j, 35k
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: July 31, 2002

Topcoat, operations for PM and PM-10 utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. The PM and PM10 testing is required to demonstrate that the source is not major for either pollutant, under 326 IAC 2-2, Prevention of Significant Deterioration. This test shall be repeated at least once every two and half (2.5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

- (e) The compliance tests required in (a), (b) and (c) of this condition shall be made by September 30, 2002 at maximum production capacity or its capacity at the time of testing. Another test shall be performed if the initial test was conducted at less than 95% capacity, and be made sixty (60) days after achieving maximum production.

D.5.15 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.5.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.16 Permanent or Temporary Total Enclosure

- (a) The capture system for the ELPO/E-Coat System and the Final Spot Repair shall meet the following criteria for a Permanent or Temporary Total Enclosure:
- (1) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
 - (2) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
 - (3) The total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four (4) walls, floor, and ceiling.
 - (4) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meter per hour (200 fpm). The direction of air through all NDO's shall be into the enclosure.
 - (5) All access doors and windows whose areas are not included in Section (c) and are not included in the calculations in Section (d) shall be closed during routine operation of the process.
- or
- (b) Verify 100% capture through other methods as approved by the Commissioner.

D.5.17 Volatile Organic compounds

- (a) The Regenerative Thermal Oxidizer (RTO) shall be in operation at all times when the ELPO/E-Coat System and the automatic zones for the Primer Surface/Guidecoat System, and Topcoat System are in operation.
- (b) The RTO shall be calibrated, operated and maintained in accordance with the manufacturer's specifications.
- (c) When either Final Repair Station is in operation its respective Carbon Adsorber shall be in operation at all times.

D.5.18 Particulate Overspray

- (a) The wet scrubbers, or dry filters shall be in operation or in place at all times when the Primer Surfacer/Guidecoat System, and Topcoat System are in operation.

- (b) The dry filters shall be in place at all times the Final and Spot Repair System are in operation.

D.5.19 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

D.5.20 Performance Testing [326 IAC 3-6]

- (a) All testing required in D.5.14 shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements

D.5.21 Operating Parameters

- (a) The Regenerative Thermal Oxidizer shall maintain a minimum operating temperature determined by a performance test to maintain at least 95% destruction efficiency, that is necessary to achieve compliance with condition D.5.5(c) and D.5.7. Until a performance test is performed the combustion chamber shall maintain a minimum operating temperature of 1350 °F. The operating temperature of the exhaust of the RTO shall be continuously recorded whenever it is operating.
- (b) The Permittee shall maintain a maximum VOC concentration in the exhaust vent stream from the carbon adsorbers determined in the most recent stack tests to maintain at least 85% VOC removal, that is necessary to achieve compliance with the VOC limits in 326 IAC 8-2-9. This VOC concentration shall be measured and recorded once per shift at each Final Repair Station. The source shall be considered to be out of compliance if the outlet VOC concentration averaged over any continuous 24-hour period is greater than the maximum value established during the most recent compliance demonstration; and
- (c) All carbon in each control device shall be replaced with fresh carbon quarterly, or more frequently depending upon the VOC concentration readings in item (b) of this condition.

D.5.22 Monitoring

- (a) Daily inspections shall be performed to verify that the liquid levels and flow rates of the wet scrubbers meet the manufacturer's recommended level. To monitor the performance of the wet scrubbers, the scrubbant level of the wet scrubbers shall be maintained weekly at a level where surface agitation indicates impact of the air flow. To

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Modification

Source Background and Description

Source Name:	AM General Corporation
Source Location:	13200 McKinley Highway, Mishawaka, Indiana 46545
County:	St. Joseph
SIC Code:	3711
Operation Permit No.:	T 141-6023-00031
Operation Permit Issuance Date:	February 25, 1999
First Minor Permit Modification No.:	141-15726-00031
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a permit modification application from AM General Corporation relating to the change in the Part 70 permit. The change "do not involve significant changes to existing monitoring, reporting, or record keeping requirements", under 326 IAC 2-7-12(b), Minor Permit Modification. (changes are **bolded** and deletions are ~~struck-through~~ for emphasis).

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performance test is performed the combustion chamber shall maintain a minimum operating temperature of 1350 °F. ~~or a minimum operating temperature determined in the most recent stack tests to maintain at least 95% destruction efficiency, that is necessary to achieve compliance with condition D.5.5(c) and D.5.7.~~ The operating temperature of the exhaust of the RTO shall be continuously recorded whenever it is operating.

Existing Approvals

The source was issued a Part 70 Operating Permit (141-6023-00031) on February 25, 1999. The source has since received the following:

- (b) First Minor Source Modification No.: 141-10954, issued on August 16, 1999;
- (c) First PSD/Significant Source Modification No.: 14111673, issued on June 28, 2000;
- (c) First Administrative Amendment No.: 141-12041, issued on April 20, 2000;
- (d) Second Administrative Amendment No.: 141-12212, issued on August 22, 2000;
- (e) Third Administrative Amendment No.: 141-12413, issued on August 4, 2000;
- (f) Fourth Administrative Amendment No.: 141-14597, issued on July 31, 2001; and
- (g) First Significant Permit Modification No.: 141-15219, issued on May 8, 2002;

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 13, 2002.

Emission Calculations

No emissions will result from this permit change.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) determination made in Significant Permit Modification 141-15219-00031 will remain the same.
- (b) The National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) determination made in Significant Permit Modification 141-15219-00031 will remain the same.

State Rule Applicability - Entire Source

Rules determined in Significant Permit Modification 141-15219-00031 will remain the same.

State Rule Applicability - Individual Facilities

Rules determined in Significant Permit Modification 141-15219-00031 will remain the same.

Conclusion

The permit changes shall be subject to the conditions of the attached **Minor Permit Modification No. 141-15726-00031**.